TRI Burden Reduction

Analytic Methods and Preliminary Results

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2002 Baseline Burden

- Baseline burden refers to the starting point you are using to compare against the change resulting from rulemaking.
- 2002 baseline burden for Form R is approximately 3.8 million hours.
- 2002 baseline burden for Form A is approximately 260,000 hours

TRI Program Related Options

- In contrast to modifications to Form R itself, the Program Related burden reduction options center on raising reporting thresholds, expanding eligibility for Form A or a simplified form, instead of filling out Form R itself.
- The trade off to society presented by this type of burden reduction are the burden hours saved by not filling out Form R balanced against any lost data of lbs. toxic chemicals not reported.

TRI Program Related Options

- Part of evaluating the trade-off can include consideration of specific groups of filers and chemicals as well as end users of data.
  - Examples for filers could include, small businesses, zero releasers, and filers who only recycle
  - Examples of chemicals could include TRI chemicals in nondispersible form (e.g., metal alloys), VOCs that are oxidants only.
  - Examples of specific end users of data include community leaders, environmental groups, and state governments.

Option 1, Small Businesses

- Small businesses (<50 employees per facility)
- This option could vary according to small business definition and threshold
- The range of facility size could be between 10 and 100 employees per facility

Option 2, Raising thresholds for classes of chemicals/facilities

- Would raise thresholds for specific categories of facilities or chemicals
- One variant of this option pertains to zero releasers, defined as facilities that do not release TRI chemicals either onsite or offsite.
- Zero releasers manage TRI chemicals through recycling, energy recovery or treatment for destruction.
- Simplified reporting form for those who only recycle.

Zero Releaser Demographics

- 5300 facilities
- 8500 Form Rs
- Over 300 million lbs of TRI chemicals recycled, burned for energy recovery or treated.
- Among recycling zero releasers, metal recovery (lead, copper, manganese, chromium, nickel) was dominant.
- Among treatment, acid neutralization for sulfuric, nitric, formic acids were dominant.

Option 3, Expanding eligibility for Form A

- Modeling assuming a 500 lbs limit on annual reportable amount but removed recycling & energy recovery from annual reportable amount (ARA).
- A variant of this option would be to increase the threshold on the ARA or both remove data fields from the ARA and increase the threshold.

Option 4, No Significant Change

- 3 parameters analyzed:
  - production ratio (Section 8.9)
  - total releases (Section 8.1)
  - total production related wastes (Section 8.1-8.8)
- Range of 0 to 15 percent used to model.
- Variant using range codes instead of 3 parameters is currently under consideration.

Option 5, Range Reporting in Section 8 of Form R

- No preliminary analysis at this time
- Future analysis to focus on burden savings, if any and an Option 4 variant

Range Reporter Demographics

- Between 1991 and 2002, 43 to 53 % of all Form R's submitted were eligible to use current range codes in sections 5 and 6, respectively.

- Despite this fact, actual range reporting averaged only between 21 and 37 % over the same period.

- One possible reason range codes are not used more widely is that 'range' codes are not currently allowed in Section 8, possibly forcing the Form R filer to estimate 'precise' weight. This may deter users from submitting a range code in Section 5 and 6 since the weight would already be required in Section 8.

Ongoing Analysis

- Disaggregated chemical specific data loss for Options 1, 3 and 4.
- Correlational analysis for production ratio, total releases, and total production related waste for Option 4.
- Option 5, Range reporting variant for Option 4.